

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**[[PROPOSED] ORDER RE:  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY’S MATERIAL SHOULD BE  
FILED UNDER SEAL**

This Document Relates to:  
  
ALL CASES

Having considered Plaintiffs’ September 23, 2025 Administrative Motion To Consider Whether Another Party’s Materials Should be Filed Under Seal, the Court hereby **GRANTS** the Motion and **ORDERS** that the following materials shall be sealed:

Document	Description	Designating Party
<b>Exhibit 1</b>	Excerpt of document produced by Defendants, Bates stamped UBER_JCCP_MDL_000031233, designated as Confidential, containing confidential information about Uber’s Flack system and non-public employee email addresses	Defendants
<b>Exhibit 2</b>	Excerpt of production letter from counsel for Defendants to counsel for Plaintiffs dated August 19, 2024, containing link to secure file transfer and user name.	Defendants
<b>Exhibit 3</b>	Draft Joint Discovery Letter Brief Relating to Safety Data	Defendants

Document	Description	Designating Party
<b>Exhibit 4</b>	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis, containing confidential information about Uber's Flack system	Defendants
<b>Exhibit D</b>	Email correspondence between the Parties dated July 31 – August 5, 2025	Defendants
<b>Exhibit E</b>	Correspondence between the Parties dated August 7 – September 15, 2025	Defendants
<b>Exhibit F</b>	Letter dated January 16, 2024 from counsel for Defendants to counsel for Plaintiffs pursuant to the Court's January 9, 2024 Order	Defendants
<b>Exhibit G</b>	Letter dated February 22, 2024 from counsel for Defendants to counsel for Plaintiffs responding to Plaintiffs' January 29, 2024 letter	Defendants
<b>Exhibit H</b>	Email correspondence between the parties dated April 19 – May 10, 2024	Defendants
<b>Exhibit I</b>	January 18, 2024 declaration of Katherine McDonald	Defendants
<b>Exhibit K</b>	Correspondence from counsel for Defendants to counsel for Plaintiffs dated June 21, 2024	Defendants
<b>Exhibit N</b>	Certification of Katherine McDonald dated January 10, 2025	Defendants
<b>Exhibit O</b>	Certification of Katherine McDonald dated February 25, 2025	Defendants
<b>Exhibit P</b>	Certification of Katherine McDonald dated March 6, 2025	Defendants
<b>Exhibit Q</b>	Exhibit to April 24, 2025 JCCP deposition of Katherine McDonald	Defendants
<b>Exhibit R</b>	Email correspondence between the parties dated April 28 – May 1, 2025	Defendants
<b>Exhibit S</b>	Draft Joint Discovery Letter Brief Relating to Safety Data	Defendants

Document	Description	Designating Party
<b>Exhibit T</b>	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis, containing confidential information about Uber's Flack system	Defendants
<b>Exhibit X</b>	Excerpts of transcript of April 24, 2025 deposition of Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Bliss and Jira systems	Defendants
<b>Exhibit Y</b>	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Defendants
<b>Exhibit Z</b>	Excerpt of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Hannah Nilles, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Defendants

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

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Hon. Lisa J. Cisneros  
United States Magistrate Judge